

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**v.**

**HISHAM MUTAN,**

**Defendants.**

)  
)  
)  
)  
)  
)  
)  
)  
)  
)

**No. 4:17-CR-00234 -RLW**

**FILED UNDER SEAL**

**MEMORANDUM IN SUPPORT OF MOTION FOR LEAVE TO FILE  
DOCUMENT UNDER SEAL**

COMES NOW Defendant Hisham Mutan (“Mutan”), by and through undersigned counsel,  
and provides this Memorandum in Support of his Motion for Leave to File Document Under Seal.

Mutan states as follows:

1.

[REDACTED]

2.

[REDACTED]

3.

[REDACTED]

4. [REDACTED]

[REDACTED]

5. [REDACTED]

[REDACTED]

[REDACTED]

6. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

██  
████████████████████

WHEREFORE, based on the foregoing, Mutan respectfully requests that this Court grant this motion, and for such other and further relief as this Court deems just and proper under the circumstances.

**BRUNTRAGER & BILLINGS, P.C.**

/s/ Neil J. Bruntrager  
Neil J. Bruntrager #29688  
Daniel J. Bruntrager, #34546  
225 S. Meramec Ave., Suite 1200  
St. Louis, Missouri 63105  
(314) 646-0066  
(314) 646-0065 Fax  
[njbatty@aol.com](mailto:njbatty@aol.com)  
[djb@law-stl.com](mailto:djb@law-stl.com)

*Attorneys for Defendants Hisham Mutan and  
Saddam Mutan*

**CERTIFICATE OF SERVICE**

I hereby certify that I filed the foregoing through the Court's CM/ECF system. I further certify that a copy of the foregoing was served on counsel for the United States.

**BRUNTRAGER & BILLINGS, P.C.**

/s/ Neil J. Bruntrager

Neil J. Bruntrager #29688

Daniel J. Bruntrager, #34546

225 S. Meramec Ave., Suite 1200

St. Louis, Missouri 63105

(314) 646-0066

(314) 646-0065 Fax

[njbatty@aol.com](mailto:njbatty@aol.com)

[djb@law-stl.com](mailto:djb@law-stl.com)

*Attorneys for Defendants Hisham Mutan and  
Saddam Mutan*